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Attorneys for Debtors and Reorganized Debtors

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**STIPULATION CONTINUING HEARING
AND EXTENDING TIME FOR
REORGANIZED DEBTORS TO
RESPOND TO MOWBRAY'S MOTION
FOR LEAVE TO FILE AMENDED
PROOF OF CLAIM**

Related to Docket No. 9392

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is
2 entered into by PG&E Corporation and Pacific Gas and Electric Company (collectively, the
3 “**Debtors**” or “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the
4 “**Chapter 11 Cases**”), and The Original Mowbray’s Tree Service, Inc. (“**Mowbray’s**”). The
5 Reorganized Debtors and Mowbray’s are referred to in this Stipulation and Agreement for Order
6 collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as
7 follows:

8 **RECITALS**

9 A. On November 3, 2020, Mowbray’s filed a *Motion for Leave to File Amended*
10 *Proof of Claim* [Dkt. No. 9392] (the “**Motion**”).

11 B. Any opposition or response to the Motion is due to be filed with the Bankruptcy
12 Court and served on counsel for Mowbray’s by December 1, 2020.

13 C. Counsel for the Reorganized Debtors and counsel for Mowbray’s have agreed to a
14 modified briefing schedule for the Motion, whereby the Reorganized Debtors have until
15 December 18, 2020, to file and serve any opposition or response to the Motion, and Mowbray’s
16 has until January 7, 2021 to file any reply to the opposition or response.

17 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
18 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
19 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,
THAT:

20 1. The time for the Reorganized Debtors to file and serve any opposition or response
21 to the Motion is extended to December 18, 2020.

22 2. The time for Mowbray’s to file any reply to the opposition or response is extended
23 to January 7, 2021.

24 3. The hearing on the Motion is continued to January 12, 2021 at 10:00 a.m. (Pacific
25 Time).

1 4. This Stipulation shall constitute the entire agreement and understanding of the
2 parties relating to the subject matter hereof and shall supersede all prior agreements and
3 understandings relating to the subject matter hereof.

4 5. This Stipulation may be executed in counterparts, each of which shall be deemed
5 an original but all of which together shall constitute one and the same agreement.

6 6. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or
7 controversies arising from this Stipulation.

8
9 Dated: November 25, 2020

Dated: November 25, 2020

10 WEIL, GOTSHAL & MANGES LLP
11 KELLER BENVENUTTI KIM LLP

SHEPPARD, MULLIN, RICHTER &
HAMPTON LLP

12 /s/ Thomas B. Rupp

/s/ Ori Katz

13 Thomas B. Rupp

Ori Katz

14 *Attorneys for Debtors*
15 *and Reorganized Debtors*

Attorneys for The Original Mowbray's
Tree Service, Inc.